

Exhibit 8

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

MICHAEL BAZZREA, et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	CA No. 3:22-cv-00265
)	
ALEJANDRO MAYORKAS, et al.,)	
)	
<i>Defendants.</i>)	
)	

DECLARATION OF COMMANDER BROOKE GRANT

I, Commander Brooke Grant, hereby declare and state:

1. I am a commissioned officer serving on active duty in the United States Coast Guard. I have served on active duty in the Coast Guard for over 20 years and am currently serving as Chief, Military Personnel Policy Development Division (CG-1331). I have served in this position since August 2021. My prior assignments include Logistics Department Head, United States Coast Guard Sector Key West; Deputy, Office of Legal Policy and Program Development; and Staff Attorney, United States Seventh Coast Guard District Legal Office. I am generally aware of the allegations set forth in the pleadings filed in this matter and make this declaration in my official capacity, based upon my personal knowledge and upon information that has been provided to me in the course of my official duties. CG-1331 is the Coast Guard Headquarters office that originally receives requests for religious accommodation from the COVID-19 vaccination requirement.

2. Exhibit 1, attached to this declaration, provides updated data with respect to the COVID-19 vaccination requirement. However, certain data elements are either not available or

require further explanation.

3. Requests for religious accommodation from the COVID-19 vaccination requirement in the Coast Guard are centrally managed, with the Office of Military Personnel Policy, CG-133, serving as the final approval authority. Religious accommodation requests are not tracked until they reach Coast Guard Headquarters. Accordingly, the column labeled “Total Initial Requests” reflects only the number of religious accommodation requests that have been received at Headquarters. Most requests for a religious accommodation from the COVID-19 vaccination requirement have been adjudicated.

4. In March 2022, the Coast Guard granted an administrative exemption to the vaccination requirement for all members with an approved separation or retirement date no later than October 1, 2022. The Coast Guard did not act on any pending religious accommodation requests or appeals that were submitted by members who qualified for this administrative exemption.

5. Permanent medical exemptions from vaccine requirements are also centrally managed at Coast Guard Headquarters through the Office of Occupational Medicine, CG-112. CG-112 does not actively track the number of applications for permanent medical exemptions that have been submitted or denied. All permanent medical exemptions granted thus far are based on a documented severe allergic reaction to a COVID-19 vaccine or a component of the vaccine.

6. Temporary medical exemptions are processed by medical officers in the field. The Coast Guard does not maintain a database from which it can determine a complete and accurate account of all temporary medical exemptions that have been granted. In addition, because the temporary exemptions expire and are based on medical conditions that could arise during a reporting period (e.g., a member may be granted a medical exemption if he or she is infected with

COVID-19 and therefore ineligible to be vaccinated for the duration of the infection and for a period afterwards), changes in the total number of temporary medical exemptions from one reporting period to another would not reflect the total number of temporary medical exemptions that have been granted. For example, during any given period, two temporary medical exemptions might expire and two new temporary medical exemptions might be granted, but the total number of temporary medical exemptions would remain the same.

7. The Coast Guard has not taken any action to Courts-Martial members that have refused an order to become vaccinated. The Coast Guard has initiated administrative separations for enlisted members and board action for officers who have not complied with COVID-19 vaccination requirements. Of the administrative separations that have been completed, all members received a discharge with a characterization of honorable.

8. I hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge and information.

Dated: August 30, 2022


Brooke Grant
Digitally signed by
Brooke Grant
Date: 2022.08.30 08:31:19
-04'00'

BROOKE GRANT
Commander
U.S. Coast Guard

Exhibit 1 to Declaration of CDR Grant

U.S. Coast Guard COVID-19 Vaccination Requirement DataCurrent as of 29 August 2022

(1) Number of religious exemption from COVID-19 vaccination:

# Initial Requests Under Review	# Initial Request Approved	# Initial Requests Denied	Total Initial Requests
1	5	1236 ¹	1343

# Appeals Under Review	# Appeals Denied	# Appeals Approved	Fully Resolved Requests	
			Aggregate # of Approved Requests	Aggregate # of Denied Requests
3	881 ²	7	12	1183

(2) Number of medical-exemption requests from COVID-19 vaccination:

Temporary Medical Exemption Requests	Permanent Medical Exemptions Denied	Permanent Medical Exemptions Granted	Total Permanent Medical Exemption Requests
Unknown	Unknown	8	Unknown ³

(3) Number of courts-martial and separation proceedings pending or concluded against a service member whose request for a religious exemption was denied after appeal:

Courts-Martial		Administrative Separation (ADSEP)	
Pending	Concluded	ADSEP Initiated	ADSEP Completed
0	N/A	81	73

¹ This does not include members who submitted a religious accommodation request but were then granted an administrative exemption based on an approved separation or retirement date no later than October 1, 2022.

² This does not include members who submitted a religious-accommodation appeal but were then granted an administrative exemption based on an approved separation or retirement date no later than October 1, 2022.

³ The Coast Guard is not actively tracking requests and continues to process permanent medical exemption requests when received.